

REMARKS

Claims 1-24 are pending in the Application. Claims 1-24 are rejected under 35 U.S.C. §102(e). Applicant respectfully traverses these rejections for at least the reasons stated below and respectfully requests that the Examiner reconsiders and withdraws these rejections.

Applicant appreciates the Examiner discussing the office action, and in particular the rejection to claim 1, with Applicant's attorney, Robert A. Voigt, Jr., on August 18, 2004.

I. REJECTIONS UNDER 35 U.S.C. §102(e):

The Examiner has rejected claims 1-24 under 35 U.S.C. §102(e) as being anticipated by Inokuchi et al. (U.S. Patent No. 6,144,969) (hereinafter "Inokuchi"). Applicant respectfully traverses these rejections for at least the reasons stated below and respectfully requests the Examiner to reconsider and withdraw these rejections.

For a claim to be anticipated under 35 U.S.C. §102, each and every claim limitation must be found within the cited prior art reference and arranged as required by the claim. M.P.E.P. §2131.

Applicant respectfully asserts that Inokuchi does not disclose "loading a first file written in a first format, wherein said first file comprises a first listing of one or more portions of object code segments, wherein each of said one or more portions of object code segments comprises one or more blocks of addresses, wherein each of said one or more blocks is associated with a particular offset value, wherein said first file further comprises a second listing of one or more symbol names and corresponding addresses" as recited in claim 1 and similarly in claims 9 and 17. The Examiner cites Figures 5, 11 and 30; column 6, lines 11-35; and column 9, lines 26-47 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 3. Applicant respectfully traverses and asserts that Inokuchi instead discloses a file name conversion method for converting a first file name which can be distinguished by the first operating system to a second file name which can be distinguished by a

second operating system. Column 2, lines 21-26. Inokuchi further discloses that the structure of a software includes a file manager FLM and a virtual device manager IMM. Column 5, lines 59 – column 6, line 1. Inokuchi further discloses that the virtual device manager IMM provides virtual address space to the file manager FLM. Column 6, lines 8-10. Inokuchi further discloses that each virtual address space is constituted by a data block array. Column 6, lines 10-11. Inokuchi further discloses that the sequence manager (SQM), which is located within the virtual device manager, can access the data block without considering as to whether the position of the physical address is real or temporary by merging the address with the temporary physical address. Column 9, lines 44-48.

This language is not the same as a file that comprises a listing of portions of object code segments. Further, there is no language in the cited passages that discloses that each portion of object code segments comprises blocks of addresses. Neither is there any language in the cited passages that discloses that each block is associated with a particular offset value. Neither is there any language in the cited passages that discloses a file that includes a listing of symbol names and corresponding addresses. Thus, Inokuchi does not disclose all of the limitations of claims 1, 9 and 17, and thus Inokuchi does not anticipate claims 1, 9 and 17. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "associating one or more symbol names with corresponding segment portion/offset value pairs" as recited in claim 1 and similarly in claims 9 and 17. The Examiner cites Figures 5, 11 and 30; column 6, lines 11-35; and column 9, lines 26-47 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 3. Applicant respectfully traverses. As stated above, Inokuchi instead discloses a file name conversion method for converting a first file name which can be distinguished by the first operating system to a second file name which can be distinguished by a second operating system. Column 2, lines 21-26. Inokuchi further discloses that the structure of a software includes a file manager FLM and a virtual device manager IMM. Column 5, lines 59 – column 6, line 1. Inokuchi further discloses that the virtual device manager IMM provides

virtual address space to the file manager FLM. Column 6, lines 8-10. Inokuchi further discloses that each virtual address space is constituted by a data block array. Column 6, lines 10-11. Inokuchi further discloses that the sequence manager (SQM), which is located within the virtual device manager, can access the data block without considering as to whether the position of the physical address is real or temporary by merging the address with the temporary physical address. Column 9, lines 44-48.

As stated above, there is no language in the cited passages that discloses a file that includes a listing of symbol names. Neither is there any language in the cited passages that discloses associating symbol names with corresponding segment portion/offset value pairs. Thus, Inokuchi does not disclose all of the limitations of claims 1, 9 and 17, and thus Inokuchi does not anticipate claims 1, 9 and 17. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "writing a second file in a second format, wherein said second file comprises a third listing including one or more segment portion/offset value pairs and associated symbol names" as recited in claim 1 and similarly in claims 9 and 17. The Examiner cites Figures 10, 29 and 30 as disclosing the above-cited claim limitation. Paper No. 3, page 3. Applicant respectfully traverses and asserts that Figure 10 of Inokuchi instead discloses a table used for explaining the structure of a B*Tree index node. Applicant further asserts that Figure 29 of Inokuchi instead discloses a flowchart showing an operation procedure of the flash all. Applicant further asserts that Figures 30A-C of Inokuchi instead discloses schematic diagrams explaining the rewriting operation. Applicant respectfully asserts that there is no relevance of these cited Figures with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of Figures 10, 29 and 30 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 1, 9 and 17, and thus Inokuchi does not anticipate claims 1, 9 and 17. M.P.E.P. §2131.

Furthermore, with respect to the above-cited claim limitation, Inokuchi instead discloses a file name conversion method for converting a first file name which can be distinguished by the first operating system to a second file name which can be distinguished by a second operating system. Column 2, lines 21-26. Hence, Inokuchi discloses converting the name of a file from one name to another name. This is not the same as writing a second file in a second format. Neither is there any language in Inokuchi that discloses that the second file comprises a listing that includes segment portion/offset value pairs and associated symbol names. Thus, Inokuchi does not disclose all of the limitations of claims 1, 9 and 17, and thus Inokuchi does not anticipate claims 1, 9 and 17. M.P.E.P. §2131.

Claims 2-8, 10-16 and 18-24 each recite combinations of features including the above combinations, and thus are not anticipated for at least the above stated reasons. Claims 2-8, 10-16 and 18-24 recite additional features, which, in combination with the features of the claims upon which they depend are not anticipated by Inokuchi

For example, Inokuchi does not disclose "reading a particular line in said first file; parsing said particular line in said first file; and determining whether there are more lines in said first file" as recited in claim 2 and similarly in claims 10 and 18. The Examiner cites Figures 29-36 as disclosing the above-cited claim limitations. Paper No. 3, page 3. Applicant respectfully traverses and asserts that Inokuchi instead discloses that Figure 29 is a flowchart showing an operation procedure of the flash all. Inokuchi further discloses that Figures 30A-C are schematic diagrams explaining the rewriting operation. Inokuchi further discloses that Figure 31 is a schematic diagram showing the structure of a file entry. Furthermore, Inokuchi discloses that Figures 32-34 are flowcharts showing the determination procedure of the file name conversion method. Inokuchi further discloses that Figures 35-36 are flowcharts showing the search procedure used in the file name conversion method. Applicant respectfully asserts that there is no relevance of these cited Figures with respect to the above-cited claim limitations. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of Figures 29-36 of Inokuchi with

respect to the above-cited claim limitations pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 2, 10 and 18, and thus Inokuchi does not anticipate claims 2, 10 and 18. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "storing one or more symbol name/address pairs in a first table in a memory" as recited in claim 3 and similarly in claims 11 and 19. The Examiner cites Figure 5 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Figure 5 instead discloses a searching method by means of the real B*tree so that the physical address LBA on the target CD-R disc is searched from the super block A, the node table B, the index node D and leaf nodes E, F and G which are recorded on the CD-R disc. Applicant respectfully asserts that there is no relevance of Figure 5 with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of Figure 5 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 3, 11 and 19, and thus Inokuchi does not anticipate claims 3, 11 and 19. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "storing one or more segment portion/offset value pairs in a second table in said memory" as recited in claim 3 and similarly in claims 11 and 19. The Examiner cites Figures 5-8 and 11-28 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Figure 5 instead discloses a searching method by means of the real B*tree so that the physical address LBA on the target CD-R disc is searched from the super block A, the node table B, the index node D and leaf nodes E, F and G which are recorded on the CD-R disc. Inokuchi further discloses that Figure 6 is a schematic diagram showing an example of a correspondence. Inokuchi further discloses that Figure 7 is a schematic diagram showing a node table. Inokuchi further discloses that Figure 8 is a schematic diagram explaining a maximum number of blocks. Inokuchi further discloses that Figures 11A-D are schematic diagrams explaining renewal of the data blocks. Inokuchi further discloses that Figure 12 is a schematic diagram showing the structure of PVD.

Inokuchi further discloses that Figure 13 is a schematic diagram showing the structure of a super block. Inokuchi further discloses that Figure 14 is a schematic diagram showing the structure of a super block list entry. Inokuchi further discloses that Figure 15 is a schematic diagram showing the structure of a tag entry. Inokuchi further discloses that Figure 16 is a schematic diagram showing the structure of a node table. Inokuchi further discloses that Figure 17 is a schematic diagram showing the structure of a B*tree index node. Inokuchi further discloses that Figure 18 is a schematic diagram showing the structure of an index record. Inokuchi further discloses that Figure 19 is a schematic diagram showing the structure of a sequence B*tree leaf node. Inokuchi further discloses that Figure 20 is a schematic diagram showing the structure of an extent record. Inokuchi further discloses that Figure 21 is a schematic diagram showing the structure of a directory B*tree leaf node. Inokuchi further discloses that Figure 22 is a schematic diagram showing the structure of a directory record area. Inokuchi further discloses that Figure 23 is a schematic diagram showing the structure of a directory record. Inokuchi further discloses that Figure 24 is a schematic diagram showing the structure of a directory record key. Inokuchi further discloses that Figure 25 is a schematic diagram explaining the kinds of types. Inokuchi further discloses that Figure 26 is a schematic diagram showing the structure of a file directory record. Inokuchi further discloses that Figure 27 is a schematic diagram showing the structure of a directory record. Inokuchi further discloses that Figure 28 is a schematic diagram showing the structure of a link directory record.

Applicant respectfully asserts that there is no relevance of Figures 5-8 and 11-28 of Inokuchi with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of Figures 5-8 and 11-28 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 3, 11 and 19, and thus Inokuchi does not anticipate claims 3, 11 and 19. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "storing an image base address in an entry in said memory, wherein said image base address is a starting address of said second file" as recited in claim 3 and similarly in claims 11 and 19. The Examiner cites Figures 5-8, 31, 32, 43; column 19, lines 5-27 and column 20, lines 30-59 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Inokuchi instead discloses a flash all operation in which management information, such as super block, the node table, the leaf node and the like to which large sequence key SQM is assigned are written on the last block of the last packet. Column 19, lines 25-29. Inokuchi further discloses that the file name written on the CD-R disc as a file entry is converted to the file name to which a plurality of operation systems can access. Column 20, lines 30-32. Hence, Inokuchi discloses converting the name of a file from one name to another name. Applicant respectfully asserts that there is no relevance of Figures 5-8, 31, 32, 43; column 19, lines 5-27 and column 20, lines 30-59 of Inokuchi with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of Figures 5-8, 31, 32, 43; column 19, lines 5-27 and column 20, lines 30-59 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 3, 11 and 19, and thus Inokuchi does not anticipate claims 3, 11 and 19. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "storing a program entry point in an entry in said memory, wherein said program entry is a starting address for an executable code" as recited in claim 3 and similarly in claims 11 and 19. The Examiner cites column 20, lines 14-22 and 30-59 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Inokuchi instead discloses that the DCRFS stores file information such as a file name for each file in the storage area corresponding to the file when generating the file. Column 20, lines 14-16. Inokuchi further discloses that the file name written on the CD-R disc as a file entry is converted to the file name to which a plurality of operation systems can access. Column 20, lines 30-32. Hence,

Inokuchi discloses converting the name of a file from one name to another name. Applicant respectfully asserts that there is no relevance of column 20, lines 14-22 and 30-59 of Inokuchi with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of column 20, lines 14-22 and 30-59 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 3, 11 and 19, and thus Inokuchi does not anticipate claims 3, 11 and 19. M.P.E.P. §2131.

Applicant respectfully asserts that Inokuchi does not disclose "reading said first table in said memory; selecting a first address associated with a first symbol name; reading said second table in said memory; selecting a first particular segment portion; selecting a first offset value associated with said first selected segment portion; adding said first offset value to an address of said first selected segment portion generating a first absolute address of said first offset value; comparing said first absolute address of said first offset value with said first address associated with said first symbol name; and identifying said first symbol name as being associated with said first offset value if said first absolute address of said first offset value equals said first address associated with said first symbol name" as recited in claim 4 and similarly in claims 12 and 20. The Examiner states that claims 4, 12 and 20 are rejected under the same rationale as claims 1-3. Paper No. 3, page 4. Applicant respectfully traverses and asserts that the Examiner has not cited to any passage in Inokuchi as disclosing any of the above-cited claim limitations. Applicant respectfully requests the Examiner to particularly point out in Inokuchi where Inokuchi allegedly discloses these limitations. Thus, Inokuchi does not disclose all of the limitations of claims 4, 12 and 20, and thus Inokuchi does not anticipate claims 4, 12 and 20. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "determining whether said first absolute address of said first offset value equals said first address associated with said first symbol name" as recited in claim 5 and similarly in claims 13 and 21. The Examiner cites Figures 5, 11, 30, 31, 33 and 39 as well as column 18, lines 29-46

of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Inokuchi instead discloses that the cache manager generates the super block and the block for the node table in the cache buffer. Column 18, lines 44-46. Applicant respectfully asserts that there is no relevance of Figures 5, 11, 30, 31, 33 and 39 as well as column 18, lines 29-46 of Inokuchi with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of Figures 5, 11, 30, 31, 33 and 39 as well as column 18, lines 29-46 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 5, 13 and 21, and thus Inokuchi does not anticipate claims 5, 13 and 21. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "wherein if said first absolute address of said first offset value does not equal said first address associated with said first symbol name then the method further comprises the step of: determining whether there are more offset values associated with said first selected segment portion that have not been added to said address of said first selected segment portion" as recited in claim 6 and similarly in claims 14 and 22. The Examiner cites column 18, lines 55-65 of Inokuchi as disclosing the above-cited claim limitation. Paper No. 3, page 5. Applicant respectfully traverses and asserts that Inokuchi instead discloses that after a series of processing is performed, the determination of the physical address LBA and the renewal of the B*tree by the cache manager CAM, each content is filled in the super block and the block for the node table. Column 18, lines 60-65. Applicant respectfully asserts that there is no relevance of column 18, lines 55-65 of Inokuchi with respect to the above-cited claim limitation. Applicant respectfully asserts that the Examiner must clearly explain the relevancy of column 18, lines 55-65 of Inokuchi with respect to the above-cited claim limitation pursuant to 37 C.F.R. §1.104(c)(2). Thus, Inokuchi does not disclose all of the limitations of claims 6, 14 and 22, and thus Inokuchi does not anticipate claims 6, 14 and 22. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "wherein if there are more offset values associated with said first selected segment portion that have not been added to said address of said first selected segment portion then the method further comprises the steps of: selecting a second offset value associated with said first selected segment portion; adding said second offset value to said address of said first selected segment portion which equals a second absolute address of said second offset value; comparing said second absolute address of said second offset value with said first address associated with said first symbol name; and identifying said first symbol name as being associated with said second offset value if said second absolute address of said second offset value equals said first address associated with said first symbol name" as recited in claim 7 and similarly in claims 15 and 23. The Examiner states that claims 7, 15 and 23 are rejected under the same rationale as claims 1-4. Paper No. 10, page 5. Applicant respectfully traverses and asserts that the Examiner has not cited to any passage in Inokuchi as disclosing any of the above-cited claim limitations. Applicant respectfully requests the Examiner to particularly point out in Inokuchi where Inokuchi allegedly discloses these limitations. Thus, Inokuchi does not disclose all of the limitations of claims 7, 15 and 23, and thus Inokuchi does not anticipate claims 7, 15 and 23. M.P.E.P. §2131.

Applicant further asserts that Inokuchi does not disclose "wherein if all offset values associated with said first selected segment portion have been added to said address of said first selected segment portion then the method further comprises the steps of: selecting a second particular segment portion; selecting a second offset value associated with said second selected segment portion; adding said second offset value to an address of said second selected segment portion which equals a second absolute address of said second offset value; comparing said second absolute address of said second offset value with said first address associated with said first symbol name; and identifying said first symbol name as being associated with said second offset value if said second absolute address of said second offset value equals said first address associated with said first symbol name" as recited in claim 8 and similarly in claims 16 and 24. The Examiner states that claims 8, 16 and 24 are rejected under the same

rationale as claims 1-4. Paper No. 10, page 5. Applicant respectfully traverses and asserts that the Examiner has not cited to any passage in Inokuchi as disclosing any of the above-cited claim limitations. Applicant respectfully requests the Examiner to particularly point out in Inokuchi where Inokuchi allegedly discloses these limitations. Thus, Inokuchi does not disclose all of the limitations of claims 8, 16 and 24, and thus Inokuchi does not anticipate claims 8, 16 and 24. M.P.E.P. §2131.

As a result of the foregoing, Applicant respectfully asserts that not each and every claim limitation was found within the cited prior art reference, and thus claims 1-24 are not anticipated by Inokuchi. M.P.E.P. §2131.

II. CONCLUSION

As a result of the foregoing, it is asserted by Applicant that claims 1-24 in the Application are in condition for allowance, and Applicant respectfully requests an allowance of such claims. Applicant respectfully requests that the Examiner call Applicant's attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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